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SENATORS AND OFFICERS POST-TRAVEL DISCLOSURE OF TRAVEL EXPENSES

This disclosure, along with a copy of the Private Sponsor Travel Certification Form and all attachments, MUST be provided to the Office of Public Records, Room 232 of the Hart Building, within 30 days after the travel is completed.

Date/Time	Stamp:
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•	lays after the travel is co	· ·	1100111 202 01 1110 11111	17 APR -7 PM 2: 48
In compliance with	Rule 35.2(a) and (c), 1		trick Toomey	, make the following
•	spect to travel expenses	(Name of Se s that have been or v	nator/Officer) vill be reimbursed/paid	<u></u>
	The Club fo (list all):	r Growth		<u></u>
Travel date(s):)/ 1 / - 3/ 1 3/ 1 /			
Palr Destination(s):	m Beach FL	· · · · · ·	· •-	· · · · · · · · · · · · · · · · · · ·
•	ying family member (imber/Officer: Spor	if any):	, Bridget Toomey, Pa	trick Toomey, Duncan Toomey
	NDENT CHILD, ONLY			ASE DUE TO THE ACCOMPANYING EE EXPENSES. (Attach additional pages
Expenses for Sena	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
☐ Good Faith Estimate ☑ Actual Amount	\$629.10	\$1678.05	\$640	
Expenses for Acco	mpanying Spouse or	Dependent Child (if applicable)	· · · · · · · · · · · · · · · · · · ·
	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
☐ Good Faith Estimate ☐ Actual Amount			\$640	
Provide a descript	tion of all meetings	and events attende	ed. See Senate Rule	35.2(c)(6). (Attach additional page
necessary.):_0H	rached			<u>-</u> .
		<u> </u>		<u> </u>
HAVE MADE A	DETERMINATION	THAT THE TRAVE	EL DESCRIBED ABO	IVE WAS IN CONNECTION WITH

I HAVE MADE A DETERMINATION THAT THE TRAVEL DESCRIBED ABOVE WAS IN CONNECTION WITH M'DUTIES AS AN OFFICEHOLDER, AND DID NOT CREATE THE APPEARANCE THAT I WAS USING PUBLIC OFFICE FOR PRIVATE GAIN.

4 7 17 (Date)
(Revised 1/3/11)

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PAT ROBERTS, KANSAS JAMES E. RISCH, IDAHO BRIAN SCHATZ, HAWAII JEANNE SHAKEEN, NEW HAMPSHIRE

DEBORAH SUE MAYER, CHIEF COUNSEL AND STAFF DIRECTOR EMILY GERSHON, CHIEF CLERK

TELEPHONE: (202) 224-2981 FACSIMILE: (202) 224-7416 TDD: (202) 228-3752

United States Senate

SELECT COMMITTEE ON ETHICS

March 15, 2017

The Honorable Patrick Toomey United States Senate Washington, DC 20510

Dear Senator Toomey:

This responds to your recent correspondence concerning an invitation you and your spouse received to travel to the Club for Growth Annual Winter Economic Conference, in Palm Beach, Florida, on March 16-19, sponsored by Club for Growth. Club for Growth certified to the Select Committee on Ethics (the Committee) that it will pay the necessary expenses related to the travel and that it is neither a lobbyist, nor lobbying firm, nor an agent of a foreign principal, and it is not otherwise acting as a representative or agent of a foreign government. Club for Growth has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal, and that no registered lobbyist will accompany you at any point throughout your trip.

Based on information and materials available to the Committee, and consistent with the guidance contained in this letter regarding extending your trip for a personal purpose, and assuming the actual travel and travel-related expenses conform to the information and materials you provided, it appears that the proposed payment or reimbursement of necessary expenses for this trip may be accepted under relevant Senate Rules and the Committee's Regulations and Guidelines for Privately-Sponsored Travel, so long as at the time of the payment or reimbursement, Club for Growth is neither a registered lobbyist nor lobbying firm under the Lobbying Disclosure Act of 1995, nor an agent of a foreign principal under the Foreign Agents Registration Act (and is not otherwise acting as a representative or agent of a foreign government), and provided the travel and all required documents are disclosed to the Secretary of the Senate in accordance with the provisions of Senate Rules 34 and 35. Necessary expenses may include travel expenses for the spouse of a Member if the Member determines that the attendance of the spouse is appropriate to assist in the representation of the Senate.

Based on the information you submitted, the Committee understands that, for a personal purpose, you intend to extend your trip in Palm Springs for less than one day after the conclusion of the officially related events. You are personally responsible for any additional expenses incurred as a result of extending your trip.

² The term "necessary expenses" has a specific definition. See Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms at 8.

³ The term "any point throughout your trip" has a specific definition. See id. at 2.

Under Senate Rule 35, a Senator or officer who receives payment or reimbursement for necessary expenses related to fact-finding travel must disclose those expenses to the Secretary of the Senate by filing the completed Senators and Officers Post-Travel Disclosure of Travel Expenses (Form RE-3), along with a copy of the Private Sponsor Travel Certification Form, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) within 30 days of the conclusion of Privately-Sponsored Travel.⁴

Finally, Senate Rule 34 requires a Member, on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$390 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their annual Financial Disclosure Report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,

Deborah Sue Mayer

Chief Counsel and Staff Director

Enclosure: Travel Checklist

⁴ Trip extensions for any purpose do not extend this deadline.



November 21, 2016

Hon. Pat Toomey United States Senate 248 Russell Senate Office Building Washington, DC 20510

Dear Pat,

On behalf of the members of the Club for Growth, a 501(c)(4) non-profit, and our Board of Directors, it is my pleasure to invite you to speak at the 2017 Club for Growth Annual Winter Economic Conference at The Breakers in Palm Beach, Florida. Our conference will be held from Thursday evening, March 16 through Saturday evening, March 18.

We're looking forward to another successful conference filled with compelling discourse on policy issues relating to economic freedom and prosperity. We believe that your invaluable experience and insights will be enlightening to our members.

Virginia Galligan, our Finance Director and Advisor, will be following up with your scheduler in the coming weeks to confirm your attendance. In the meantime, if you have any questions, please don't hesitate to contact Virginia by phone at 646-499-1114 or by email at VGalligan@clubforgrowth.org.

We sincerely hope that you will honor us by accepting our invitation to join us at our conference.

Sincerely,

David McIntosh President

Agenda – Senator Pat Toomey

Arrive: Palm Beach International Airport

Arrival Date: 03/16/2017 Arrival Time: 9:33 PM

March 17 Friday

7:30 AM - 9:00 AM

Continental Breakfast Available

9:00 AM - 10:00 AM
Topic: State of the Club

Speaker: Club for Growth President David McIntosh

10:00 AM - 10:30 AM

Topic: Data Analytics: A New Frontier

Speaker: Chris Wilson 10:45 AM – 11:30 AM

Topic: Upholding Conservative Principles in Congress

Speakers: Senators Ron Johnson & Pat Toomey

11:30 AM - 12:15 PM

Topic: The Philosophic Fight for the Future of America

Speaker: John Allison 12:30 PM – 1:45 PM

Luncheon with Keynote Address

Topic: The Supreme Court and the Fight to Confirm Gorsuch

Speaker: Senator Ted Cruz

2:00 PM - 2:30 PM

Topic: Dismantling Obamacare Speaker: Michael Cannon 2:30 PM – 3:15 PM

Topic: Obamacare: Are We Ever Going to Replace It with Free-Market Reforms?

Speakers: Senators Mike Lee & Rand Paul

6:00 PM - 7:00 PM

Reception 7:00 PM

Dinner with Keynote Address

Topic: The Brains Behind Brexit: What's Next?

Speaker: Daniel Hannan

March 18 Saturday

7:30 AM - 9:00 AM

Continental Breakfast Available

9:00 AM - 9:45 AM

Topic: Coming to Washington: Fighting the Leviathan for the First Time

Speakers: Congressmen Andy Biggs & Ted Budd

9:45 AM - 10:30 AM

Topic: Death by Regulation: How to Unravel Government Regulation and Protect American

Businesses

Speaker: Harry Alford 10:45 AM - 11:30 AM

Topic: Policy Discussion: Are We Finally Going to Get Pro-Growth Tax Reform?

Speakers: Congressmen David Schweikert & John Ratcliffe

11:30 AM -12:15 PM

Topic: Holding Government Accountable: Investigating and Exposing Crony Capitalism, the Misuse

of Taxpayer Funds and Other Governmental Corruption

Speaker: Peter Schweizer 12:30 PM - 1:45 PM

Luncheon with Keynote Address

Topic: What the Federal Government Can Learn from the States: Decreasing Regulation and Cutting

Taxes

Speaker: Governor Doug Ducey

2:00 PM- 2:30 PM

Topic: Ending Crony Capitalism: The Fight Against the Export - Import Bank

Speaker: Senator Richard Shelby interviewed by Matt Lewis

2:30 PM- 3:15 PM

Topic: The Freedom Caucus: Our First Line of Defense

Speakers: Congressmen Mark Meadows, Raúl Labrador & Rod Blum

6:00 PM - 7:00 PM

Reception 7:00 PM

Dinner with Keynote Address

Topic: TBD

Speaker: Mark Levin

Depart: Palm Beach International Airport

Departure Date: 03/19/2017 Departure Time: 5:21 PM

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM (Toomey)

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should NOT submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee MUST also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1.	Sponsor(s) of the trip (please list all sponsors):
	The Club for Growth
2.	Description of the trip: The 2017 Winter Economic Conference and membership meeting is an economic
	policy summit for members of the Club for Growth
3.	Dates of travel: 3/16, 3/19/17
4.	Place of travel: Palm Beach, FL
5.	Name and title of Senate invitees: Senator Toomey (other Senators include Cruz, Johnson, and Shelby)
6.	I certify that the trip fits one of the following categories:
	(A) The sponsor(s) are not registered lobbyists or agents of a foreign principal <u>and</u> do not retain or employ registered lobbyists or agents of a foreign principal <u>and</u> no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee at any point throughout the trip.
	(B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (see question 9).
'.	I certify that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
	I certify that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
•	I certify that:
	The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for de minimis lobbyist involvement.
	The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (see question 9).

9.	USE ONLY IF YOU CHECKED QUESTION 6(B) I certify that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a
	foreign principal, one of the following scenarios applies:
	(A) The trip is for attendance or participation in a one-day event (exclusive of travel time and one overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member officer, or employee on any segment of the trip.
	(B) The trip is for attendance or participation in a one-day event (exclusive of travel time and two overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee on any segment of the trip (see questions 6 and 10).
	(C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee at any point throughout the trip.
10.	USE ONLY IF YOU CHECKED QUESTION 9(B) If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:
11.	An itinerary for the trip is attached to this form. I certify that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.
12.	Briefly describe the role of each sponsor in organizing and conducting the trip:
	The Club for Growth is the sole sponsor of this trip and is the only entity responsible for the planning and
	administration of this membership conference.
	——————————————————————————————————————
13.	Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:
	The Club for Growth is a nationwide non-profit organization dedicated to promoting public policies that
	promote economic growth primarily through legislative involvement, issue advocacy, research, training,
	and educational activity.
14.	Briefly describe each sponsor's prior history of sponsoring congressional trips:
	The Club for Growth has conducted membership conferences annually since 2005 that have included the
	involvement and sponsorship of Members of Congress.

rterly newsletter,		·····	·	olicy, publishes							
		V, internet, and ra	adio on legislative issues								
Expenses for Ea	ach Participant:			quarterly newsletter, and has advertised on TV, internet, and radio on legislative issues.							
			Total Expenses for Each Participant:								
	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses							
Good Faith estimate Actual ounts	629.10	\$1485	690.72 each for Senator and spouse. \$1381.44 total.								
cipation or b) the ressional particip	trip involves an event the ation:	at is arranged or	organized specifically w								
on for selecting t	he location of the event of	or trip		······································							
Our conference has been held in Palm Beach since 2005 and our membership is accustomed to this											
ion.	······································										
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on(s) for selecting	g hotel or other lodging f	facility:	· · ·								
We work with a conference broker to secure hotels with the best rates that will accommodate our large											
	Actual ounts whether a) the training of the ressional participation or b) the ressional participation for selecting the conference has become and location of Breakers is located on (s) for selecting the conference has become and location of the conference has become and location o	whether a) the trip involves an event that cipation or b) the trip involves an event the ressional participation: membership conference is arranged without the conference has been held in Palm Beach ion. e and location of hotel or other lodging far Breakers is located at 1 S County Rd., Palmon(s) for selecting hotel or other lodging far	whether a) the trip involves an event that is arranged or or cipation or b) the trip involves an event that is arranged or or ressional participation: membership conference is arranged without regard to congruence on for selecting the location of the event or trip conference has been held in Palm Beach since 2005 and or ion. e and location of hotel or other lodging facility: Breakers is located at 1 S County Rd., Palm Beach, FL 334 on(s) for selecting hotel or other lodging facility:	whether a) the trip involves an event that is arranged or organized without regard cipation or b) the trip involves an event that is arranged or organized specifically were sistenal participation: membership conference is arranged without regard to congressional participation. on for selecting the location of the event or trip conference has been held in Palm Beach since 2005 and our membership is accussion. e and location of hotel or other lodging facility: Breakers is located at 1 S County Rd., Palm Beach, FL 33480 on(s) for selecting hotel or other lodging facility:							

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21.	Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:					
	Please see attached addendum "EthicsInset_Addendums_Senate"					
22.	Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:					
	Coach class, commercial airfare					
23. 24.	I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35). List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event: None					
25.	I hereby certify that the information contained herein is true, complete and correct. (You must include the completed signature block below for each travel sponsor.): Signature of Travel Sponsor: Name and Title: Adam Rozansky - CFO and Treasurer					
	Name of Organization: The Club for Growth					
	Address: 2001 L St NW, Suite 600					
	Telephone Number: 202-955-5500					
	Fax Number:					
	E-mail Address: ARozansky@ClubforGrowth.org					

ADDENDUMS

The Club for Growth chose The Breakers hotel for several reasons. The hotel has the conference spaces we require—for groups larger than 100 people—and the level of conference services we need to host that many people. We hire a conference broker to ensure we find the least expensive hotel that would accommodate our group. This contract was signed 3 years in advance to secure these comparatively low rates. The cost of the room at The Breakers is \$495 per evening. The rooms at this rate that we offer Members of Congress are the same rooms we block out for and rates we offer to our attendees, and is the least expensive rate that we are able to offer. This is significantly less than the non-contract room rates that start at \$810 per night that we negotiated down with the assistance of our conference broker.

Meals served at The Breakers are the same for Members of Congress as they are for conference attendees. The Club for Growth works to order the least expensive meal options that The Breakers has available, and is working with the hotel staff to reduce the costs of meals as well. The hotel works their overhead for large banquets into the meal costs so actual price reflects costs to maintain their facilities, wait staff, cleaning staff, food preparation and kitchen maintenance. In addition, "extras" are not made available to Members, including alcohol, and therefore extras are not calculated into the meal estimates for the Members.